

SECTION 5

TRAINING

5-1. General.

a. Oversight and management of HTRW projects includes additional responsibilities for planning, scheduling, and documentation of the required training. The OSHA standards for hazardous waste operations and emergency response (29 CFR 1910.120 (general industry) and 29 CFR 1926.65 (construction)) require that all employees exposed to hazardous substances, or safety hazards (directly associated with HTRW to be remediated) receive certain minimum training and, when required, medical surveillance. Records of employee training and required medical surveillance must be available at the project site. This training must be received before the employee can work on a hazardous waste site. Managers and supervisors within the RE office have the responsibility for determining which of their staff members will receive the required training and for monitoring their staff to ensure that their training is current. Funding also needs to be considered in advance to maintain a fully trained staff.

b. An individual development plan is an important tool to successfully manage the required training that employees have received, are scheduled to receive, and will need in the future. Special training is required for the duties and responsibilities connected with a hazardous waste site in addition to the basic requirements. Some of the HTRW required training courses also have refresher course requirements.

5-2. HTRW Health and Safety Training Requirements. All USACE personnel performing on-site activities at known or suspected HTRW sites (exclusion or contamination reduction zone) shall be trained in accordance with the requirements outlined in Department of Labor/OSHA 29 CFR 1910 and 29 CFR 1926. As a minimum, such training shall include:

a. A minimum of 40 hours of off-site classroom HTRW health and safety instruction (29 CFR 1910.120 (e) and 29 CFR 1926.65(e)). This training is mandatory and is available through the PROSPECT program. The course is entitled "Safety and Health for Hazardous Waste Sites" (PROSPECT course number 351);

b. Three days of actual field experience under the direct supervision of a trained, experienced supervisor (29 CFR 1910.120 (e) and 29 CFR 1926.65(e));

c. Eight hours of supervisory training for those on-site USACE personnel who directly oversee the actions of other USACE employees performing on-site activities (29 CFR 1910.120(e) and 29 CFR 1926.65(e)). The 8-hour supervisory training (a one time requirement) is not available under the PROSPECT program but is usually offered by local universities and

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training organizations. For information on the availability of such training contact your local SOHO;

d. Site-specific training (29 CFR 1910.120 (e) and 29 CFR 1926.65(e) and EM 385-1-1, 01.B.02 and 28.D.03). The site-specific training is provided by the contractor as specified in the contract specification section "Safety, Health and Emergency Response" and through compliance with the project SSHP and project specific work plans;

e. Eight hours of annual refresher training (29 CFR 1910.120 (e) and 29 CFR 1926.65(e)). This is mandatory training and is available through the PROSPECT program, "Safety and Health for Hazardous Waste Sites – 8-Hour Refresher" (766 Exportable) or could be arranged through outside sources. There is also a newly developed web-based 8-hour refresher available through the Huntsville Training Division (refer to CB No. 99-1, Safety and Health HTRW Annual Refresher Course). The refresher training should also include site-specific training as required by paragraph (e)(2) and/or (e)(4) of referenced CFRs;

f. Comprehensive Hazard Communication Training Program for Workers (29 CFR 1910.1200 and 29 CFR 1926.59). The requirement for this training applies to all USACE personnel who could be exposed to hazardous materials (brought on to the site for use rather than the waste being cleaned up) while performing their duties on either HTRW or non-HTRW construction sites. DOD developed the DOD Federal Hazard Communication training program to be implemented and enforced by all DOD components. Training material consists of two DOD publications and a videotape. These are: "Defense Federal Hazard Communication Training Program, Trainer's Guide," "Department of Defense Federal Hazard Communication Training Program, Student's Workbook," and the associated 90-minute videotape. The SOHOs at district levels have developed training sessions utilizing the DOD training materials. This training has to be completed prior to any USACE personnel assuming his/her duties that involve hazardous materials. The training covers the following areas:

- Federal Hazard Communication Standard
- Chemical Forms and Exposure Hazards
- Types of Physical and Health Hazards
- Controlling Chemical Hazards
- Introduction to MSDSs and MSDSs Physical Hazard Information
- MSDS Health Hazard Information
- Using Labels and the Hazardous Chemical Inventory

The SOHO is the responsible proponent for the OSHA-required training; and

g. Respiratory Protection Program for Employees (29 CFR 1910.134 (c) and 29 CFR 1926.103). Employers are required to develop and implement a written respiratory protection program with required worksite-specific procedures and elements for required respirator use. OSHA regulations (29 CFR 1910.134(k)) require, as part of this program, the employer to provide effective training to employees who are required to use respirators. The training must be comprehensive, understandable, and recur annually, and more often if necessary. These requirements are not specific to HTRW, but apply whenever respiratory protection is needed. For HTRW projects, site-specific respiratory training requirements should be reiterated in the SSHP and should meet the requirements set forth in the District respiratory protection program. Implementation of the appropriate respiratory protection program for USACE personnel on work sites is the local district's responsibility. For additional information on respiratory protection, refer to Sections 5 and 28 of EM 385-1-1.

5-3. Hazardous Waste Management and Transportation Training Requirements.

a. Personnel who manage hazardous waste for the purpose of shipment are required to complete a program of classroom instruction or on-the-job training that teaches hazardous waste management procedures and contingency plan implementation relevant to the positions in which they are employed, as required by EPA under 40 CFR 262.34 (a) and 40 CFR 265.16. An annual review of initial training material is also required. The training must be designed to ensure that the employees are able to respond effectively to emergencies by familiarizing them with emergency systems, procedures, plans, and equipment. The substantive requirements of the initial training under these standards are met by the initial training under OSHA. The annual review requirements are met by the OSHA 8 hour refresher including the site-specific training.

b. The Department of Transportation (DOT) 49 CFR 172.700, Subpart H requires anyone involved in any activities related to the transportation of HAZMAT to receive an initial training and a recurrent training every three years*. DOT regulations require the employer to certify that the employees have received the required training. DOT training must cover the following three areas:

(1) General awareness/familiarization training: this training is designed to enable the employee to recognize and identify hazardous materials consistent with the DOT hazard communication standards of 49 CFR Subpart 172. PROSPECT course number 223 (36 hours)

* DOD 4500.9-R, Defense Transportation Regulation II, Chapter 204, October 1999, requires that all employees who prepare and ship hazardous material by commercial or military vehicle to be trained every two years. USACE is complying with DOD requirement and requires the refresher be taken every two years rather than three as required by DOT. The list of DOD approved courses include USACE PROSPECT courses (223, 429, and 441).

and course number 429 (12 hours) satisfy the initial and refresher training requirements, respectively.

(2) Function-specific training: this training provides employees with functional-specific training concerning requirements of 49 CFR Subpart 172 which are specifically applicable to the functions the employee performs. For USACE personnel, this training focus on activities related to the proper DOT and RCRA classification of hazardous wastes and the proper development and certification of shipping documents. The above PROSPECT courses (223 and 429) are tailored to satisfy this training requirement and are DOD approved courses in accordance with the current DOD 4500.9-R. Employees involved with the shipment of Radioactive Class 7 materials require function-specific training for radioactive material. PROSPECT Course 441, Radioactive Waste Packaging, Transportation & Disposal fulfills the function-specific initial training requirement. The PROSPECT refresher course 429 with the added Radioactive Waste module serves as the corresponding function-specific refresher.

(3) Safety Training: this training provides the employee with knowledge of emergency response information, self-protection measures and accident prevention methods and procedures. The OSHA initial and annual refresher training described in paragraph 3a. above satisfy this DOT training requirement.

c. USACE Policies and Procedures.

(1) It is USACE policy that all USACE members executing hazardous waste manifests and related documents receive the required training before executing such documents. The refresher PROSPECT training course (429) can be provided on site by a PROSPECT instructor or locally by the certified district "train-the-trainer" instructor. The train-the-trainer instructor must be certified by the Professional Development Center (Huntsville), must receive the necessary up-to-date training, must obtain all the refresher course material needed to teach the refresher course through Huntsville, and must only teach employees from within his/her own district. USACE train-the-trainer instructors are only certified to teach the refresher course not the basic 36-hour course.

(2) After receiving the required DOT training, USACE personnel assigned the responsibility of signing hazardous waste manifests and related documents, must submit the training certificate to the district Commander or Deputy Commander to certify that the employee has been trained and is certified in accordance with 49 CFR 172, Subpart H. If USACE personnel receive training from sources other than PROSPECT, the district will be responsible to assure that the training meets DOT requirements and that such training focus on activities related to the proper DOT and RCRA classification of hazardous wastes and the proper development and certification of shipping documents. In addition to the training certification, USACE

personnel must be formally designated and authorized by the district Commander or Deputy Commander to sign Hazardous Waste Manifests and related documents. In the case of radioactive waste, only the District Commander can designate and authorize employees to sign the shipping documents. The authorization letter should also show that the individual is within his or her scope of employment when signing manifests and related documents. The nomination should further provide information that the person has the necessary experience and has satisfactorily performed as a Corps employee. A record of current training, including the preceding three years have to be kept as long as the employee is employed and 90 days after employment ends. The record must include the employee's name; most recent training completion date; a description, copy or location of the training materials; the name and address of the training provider; and a copy of the District Commander/Deputy Commander certification.

5-4. Asbestos Abatement Training Requirements. For projects that involve asbestos abatement, the following training requirements shall be met by USACE personnel responsible for project oversight:

- a. Personnel collecting bulk samples shall be trained as an "Inspector" pursuant to EPA 40 CFR 763, subpart E, appendix C, by an accredited provider.
- b. Personnel developing or overseeing asbestos project designs shall be trained as a "Project Designer" pursuant to EPA 40 CFR 763, subpart E, appendix C, by an accredited provider.
- c. Personnel conducting onsite construction QA shall be trained as a "Contractor/Supervisor" pursuant to EPA 40 CFR 763, subpart E, appendix C, by an accredited provider.
- d. Annual refresher training is required to meet the applicable categories above.
- e. All personnel performing typical onsite construction QA of asbestos abatement projects must meet the training requirements for the "competent person" as defined in the OSHA 29 CFR 1926.1101(o)(4).
- f. The EPA asbestos training requirements presented in the above paragraphs are described in the EPA's Model Accreditation Plan (MAP) subpart E, appendix E of 40 CFR Part 763 - Asbestos. The MAP applies to work in public and commercial buildings as well as to work being performed in schools. EPA has another asbestos related training requirement in their National Emission Standards for Hazardous Air Pollutants (NESHAP) at 40 CFR 61.145 (c)(8) of subpart M. This training requirement applies to at least one on-site representative (such as a foreman) for demolition and renovation activities that involve the removal, handling, or disturbance of regulated asbestos containing material. A NESHAP training refresher course is required every two years. NESHAP considers those individuals who have completed EPA MAP

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Contractor/Supervisor training and annual refresher training to be in compliance with the NESHAP training requirements.

g. USACE Policy on Asbestos Training Requirements for USACE Personnel. Department of Defense Instruction (DODI) 4715.10, Environmental Education, Training and Career Development specifically includes the EPA asbestos MAP training as environmental-related Federally mandated training for DOD employees. The instruction also requires DOD personnel to be certified as required by Federal or state requirements. AR 420-70, "Buildings and Structures," requires compliance with Federal, state, and local requirements concerning asbestos activities including training. AR 200-1 requires USACE Commanders to comply with legally applicable and appropriate Federal, state, and local environmental regulations and for Army personnel to meet EPA MAP education and training requirements. Compliance with state environmental regulations is required, therefore, USACE personnel must check the requirements of the state in which the work is to be performed (Refer to the legal opinion under Appendix F, which allows USACE Commands to pay for asbestos training, certifications, licenses, and fees).

h. Sources of Asbestos Training Courses and Technical Information. The Huntsville Training Directorate has no asbestos training courses (except for a brief coverage of asbestos waste manifesting that is covered in the 36-hour PROSPECT course entitled "Hazardous Waste Management and Manifesting"). However, 40 CFR Part 763 provides information on EPA-approved MAP asbestos training courses. To obtain a free listing of training providers in your state (or nationally), call the EPA contractor, Vista Computer Services, at (800) 462-6706. The vendor listing is updated quarterly and includes addresses, POCs, phone numbers, and the types of training offered. For additional information, consult your training officer, library, safety and occupational health office, local EPA, or OSHA office. Asbestos related reference material may be obtained by calling the toll-free EPA hotline at (800) 368-5888.

5-5. Lead Hazard Control (Abatement) Training Requirements.

a. All USACE personnel conducting onsite QA of any lead hazard control (abatement) project shall be trained in accordance with OSHA 29 CFR 1926.62(1)(2).

b. For projects that involve lead hazard control (abatement) activities in public access buildings (including target housing and child-occupied facilities as defined in 40 CFR 745), the following additional training requirements shall be met by USACE personnel responsible for performing project oversight:

(1) Personnel conducting or overseeing the collection of bulk (i.e., paint chips), dust (i.e., dust wipes), or soil samples or taking direct reading samples shall be trained in accordance with EPA 40 CFR 745 and meet the "inspector" qualifications and accreditation requirements;

(2) Personnel developing or overseeing lead hazard control (abatement) project designs shall be trained as a “Project Designer” pursuant to EPA 40 CFR 745.226(c)(1), by an accredited provider; and

(3) Personnel conducting onsite QA of lead hazard control (abatement) projects, shall be trained as a “Supervisor” pursuant to EPA 40 CFR 745.226(b)(1), by an accredited provider.

c. For lead projects that DO NOT involve public access buildings (including target housing and child-occupied facilities), such as lead-based paint abatement on steel and hydraulic structures, USACE personnel responsible for project oversight need only be trained in accordance with OSHA 29 CFR 1926.62.

5-6. Ordnance and Explosives (OE) Training Requirements. Personnel involved in OE response activities must receive training on ordnance recognition and safety and must be thoroughly trained regarding the nature of the materials handled, hazards involved, and necessary precautions. All personnel performing on-site work activities, wherein they may be exposed to hazards resulting from hazardous waste site operations, must complete applicable training in compliance with 29 CFR 1910, 29 CFR 1926, EM 385-1-1, and ER 385-1-92. Additional training requirements and qualifications concerning OE response activities will be published, in the near future, in ER 385-1-95. This document will provide guidance concerning both USACE and contractor personnel, and requirements concerning the specific type of work being performed. The following training courses are recommended to acquire a working familiarity with OE policy and procedures:

a. U.S. Army OE Safety Workshops: Typically 3-day workshops (one for conventional OE and one for CWM projects) are provided by CEHNC Design Center and OE MCX personnel. The workshop provides a general background of OE projects, reviews the laws and regulations governing OE projects, provides a comparison of OE and HTRW projects, describes typical OE project flow, and provides background on the various types and components of OE;

b. OE Recognition Training: This weeklong training course provides an in-depth look at the types of OE and the procedures for recognizing OE in the field. The hazards associated with specific ordnance items are explained in a manner to promulgate management of these hazards onsite; and

c. Site-Specific Training: Often it is beneficial to retain the project’s OE support unit (i.e., 52nd EOD Group, Army Technical Escort Unit) to conduct site specific training that is focused on the particular OE items of concern and the associated hazards. The training should include a review of the measures to be taken to protect workers from OE hazards. Requests for this support should be made through the OE CX.

5-7. Training Documentation. In addition to the mandatory training requirements established under the various environmental and safety laws and regulations, each regulation carries specific training documentation requirements. Many times, employees are properly trained in accordance with Federal and state regulatory training requirements; however, the training was not properly documented in the files or the training files cannot be produced during a regulatory inspection. Thus, this may result in a violation being pursued by the inspector. Documenting that training has been completed is the easiest part of training and must be done in accordance with the specific regulatory requirements. This means that training records must include specifically designated information and in many cases this information must be maintained at specific locations at the facility, depending on the regulatory requirement. Documentation of all health and safety training, including the names of employees trained, the duration of the training, the contents of the training courses, and the dates of training will be appended to the SSHP. Each employee who has successfully completed the training and field experience requirements specified above will be certified as having successfully completed the necessary training and will maintain a copy of the written certification at the project site.

5-8. Specialized Training. Other highly recommended specialized training includes confined space entry/rescue and first aid/CPR. There are also many Federal environmental laws that require specialized training, such as for lead abatement activities. The U.S. Army Environmental Awareness Support Center published a directory of environmental training courses in July 1997. Eventually many of the courses in the directory will be part of the Army Environmental Training Master Plan (AETMP). A list of all PROSPECT courses can be found at:
<http://pdsc.usace.army.mil>